

Illinois Commerce Commission
Pipeline Safety
Pipeline Safety Report

Operator: AMEREN ILLINOIS COMPANY	Operator ID#: 32513
Exit Meeting Contact: (Not Applicable)	Total Man Days: 0
Pipeline Safety Representative(s): Charles Gribbins	
Company Representative to Receive Report: Michael Fuller	Emailed Date:
Company Representative's Email Address: mfuller2@ameren.com	08/13/2014

Inspection Summary

Inspection Type	Location	ICC Analyst	Inspection Unit(s)	Man Day(s)	Inspection Date(s)	Contact(s)
Compliance Follow-Up	Springfield	Charles Gribbins	PAWNEE	0	7/21/2014	

Statement of Activities

Staff conducted a compliance follow-up of Ameren Illinois' Operations and Maintenance Manual. After Staff completed the review, Staff was able to correct the NOA's listed below.

Staff conducted a review of the operator's O&M Manual, corrected the NOA's, and can now correct NOPV 2009-V001-0314.

INSPECTION FINDINGS

Compliance Follow-Up

Issues(s) Found:

[NO ISSUES FOUND]

Notice Of Amendment(s) Found:

[NO NOAS FOUND]

Notice Of Violation(s) Found:

[NO NOPVS FOUND]

PAST INSPECTION FINDINGS

Issue(s) Corrected:

[NO ISSUES CORRECTED]

Notice Of Amendment(s) Corrected:

2013-A001-00209 (Code Part [192.615(a)(3)(iii)] - Staff indicated that a hot link was not working properly. Staff reviewed the section in question and found the hot link to be operating properly as Staff requested. After this review, the NOA can be corrected at this time.

2013-A001-00210 (Code Part [192.605(b) (2)]) - Staff indicated that the operator needs to conduct testing for isolation. Staff reviewed Ameren Illinois' 2014 Gas Operating & Maintenance Plan CORR 2.19 3. A. and B. which now states additional testing

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for isolation shall be performed if there is a difference in potentials less than 25 mv. After this review the NOA can be corrected at this time.

2013-A001-00211 (Code Part [192.605(b)]) - Staff indicated that the operator did not include documentation of the leak test was being performed on the cap, plug, or fittings used to isolate the live facilities. Staff reviewed Ameren Illinois' 2014 Gas Operating & Maintenance Plan, the following sections were found to have been updated: ABND 2.01 Abandonment of Gas Facilities, Subsection 1., A., (4) will be checked with leak detection fluids and Subsection 5., C., Service record card or Service transaction form/card should be updated to document the retirement and leak test performed to check the capping of the pressurized stub. After this review, the NOA can be corrected at this time.

2013-A001-00212 (Code Part [192.13(c)]) - Staff indicated that the operator did not list the type of guard post or railing that would be allowed to be installed around meter sets. Staff reviewed Ameren Illinois' 2014 Gas Operating & Maintenance Plan, METR 1 Subsection 3.F. (3) which now reads: (3) Protected from damage by guard posts or railings where exposed to vehicular traffic or other outside forces. There are two sizes of pre-fab steel post meter guards available through the storeroom: Stock Code 62 05 159 has 2 inch IPS legs and cross members; Stock Code 62 05 160 has 4 inch IPS legs and 2 inch IPS cross members. After this review, the NOA can be corrected.

2013-A001-00213 (Code Part [192.615(a)(1)]) - Staff indicated that DOJM order is still indicated rather than Job Order#. Staff reviewed Ameren Illinois' 2014 Gas Operating & Maintenance Plan 2, A, (11), which now states: Job Order# - used to document an associated DOJM order. After this review the NOA can be corrected at this time.

2013-A001-00214 (Code Part [192.615(a)(3)(i)]) - Staff indicated that an FI unit could be used as a verification method. Staff reviewed Ameren Illinois' 2014 Gas Operating & Maintenance Plan D. Leak Recheck (5) Verification Method-(required) The recheck of a repaired leak shall be performed with CGI and bar holes to verify no gas exists below grade. All indications to and FI unit that can be used for verification of underground leaks have been removed from Ameren's O&M Manual. After this review the NOA can be corrected at this time

2013-A001-00256 (Code Part [520.10(a)(6)]) - Staff requested adding a statement to the O&M Plan, to file a copy with the Illinois Commerce Commission. Staff reviewed Ameren Illinois' 2014 Gas Operating & Maintenance Plan, and noted that the operator has updated the O&M Plan in the Forward 2. B. to now read: B. An electronic and hardcopy of the latest version of Ameren Illinois' Gas Operating and Maintenance Plan will be filed with the Illinois Commerce Commission. After this review, the NOA can be corrected.

2013-A001-00257 (Code Part [192.605(a)][192.605(c)(3)]) - Staff indicated that the operator's procedures were lacking for notifying the responsible operating personnel when notices of abnormal operations are received. Staff reviewed Ameren Illinois' 2014 Gas Operating & Maintenance Plan, and noted that the operator has updated the O&M Plan EMER 2.11-Control Room 2. Loss of Communications C and 3. Alarm Management C. After completion of this review, the NOA can be corrected.

2013-A001-00258 (Code Part [192.605(b)][192.481(a)]) - Staff indicated that the operator's procedures were lacking for the inspection of piping covered with installation to be checked for atmospheric corrosion. Staff reviewed Ameren Illinois' 2014 Gas Operating & Maintenance Plan, and noted that the operator has updated the O&M Plan CORR 1- Corrosion Control Requirements Subsection 13.B (h). After completion of this review, the NOA can be corrected.

2013-A001-00259 (Code Part [192.605(a)][192.605(b)(3)]) - Staff indicated that the operator's O&M Manual did not define how construction records, maps, and operating history would be maintained. Staff reviewed Ameren Illinois' 2014 Gas Operating & Maintenance Plan, and noted that the operator has updated the O&M Plan CONS 1- Gas Construction Oversight Requirements 2. Construction Records, Maps, and Operating History. After completion of this review, the NOA can be corrected.

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2013-A001-00260 (Code Part [192.13(c)][192.509(b)]) - Staff indicated that the operator's procedures were lacking for the pressure testing of pipes 2" or less. Staff reviewed Ameren Illinois' 2014 Gas Operating & Maintenance Plan, and noted that the operator has updated the O&M Plan PTST 1-Pressure Testing Requirements 4. Testing. After completing the review, the NOA can be corrected.

2013-A001-00261 (Code Part [192.605(a)][192.605(c)(1)(iii)]) - Staff indicated that the operator's O&M Manual did not indicate where loss of communications would be located. Staff reviewed Ameren Illinois' 2014 Gas Operating & Maintenance Plan, and noted that the operator has updated the O&M Plan to include the following information: EMER 2.11-Control Room 2. Loss of Communications. After completing the review, the NOA can be corrected.

2013-A001-00262 (Code Part [192.273(b)][192.285(c)]) - Staff indicated that the operator's O&M Manual did not have a procedure that indicated if a person made an unacceptable joint. Staff reviewed Ameren Illinois' 2014 Gas Operating & Maintenance Plan, and noted that the operator has updated the O&M Plan to include the following information: POLY 2.09-Plastic Fusion Qualification 3. Testing of Plastic Fusion Joints. After completing the review, the NOA can be corrected.

2013-A001-00263 (Code Part [192.605(a)][192.619(a)(3)]) - Staff indicated that the operator's O&M Manual did not have a procedure requiring the MAOP to be determined by the highest operating pressure to which the line was subjected between July 1, 1965 and July 1970. Staff reviewed Ameren Illinois' 2014 Gas Operating & Maintenance Plan, and noted that the operator has updated the O&M Plan to include the following information: PTST 2.05-Establishing MAOP. After completing the review, the NOA can be corrected.

2013-A001-00264 (Code Part [192.605(b)(7)][192.735(a)]) - Staff indicated that the operator's O&M Plan did not have a procedure defining the storage of excess flammable or combustible at a safe distance from the compressor buildings. Staff reviewed Ameren Illinois' 2014 Gas Operating & Maintenance Plan, and noted that the operator has updated the O&M Plan to include the following information: SFCS 2.01 – Compressor Station subsection 3. Storage of Combustible or Flammable Materials. After completing the review, the NOA can be corrected.

2013-A001-00265 (Code Part [192.605(a)][192.605(c)(2)]) - Staff indicated that the operator's procedures were lacking for checking critical locations after abnormal operations. Staff reviewed Ameren Illinois' 2014 Gas Operating & Maintenance Plan, and noted that the operator has updated the O&M Plan EMER 2.11-Control Room 2. Loss of Communications C and 3. Alarm Management D. After completing the review, the NOA can be corrected.

2013-A001-00266 (Code Part [192.605(a)][192.619(a)(4)]) - Staff indicated that the operator's O&M Manual did not have a procedure requiring the MAOP to be determined by the maximum safe operating pressure determined by the operator. Staff reviewed Ameren Illinois' 2014 Gas Operating & Maintenance Plan, and noted that the operator has updated the O&M Plan to include the following information: PTST 2.05-Establishing MAOP. After completing the review, the NOA can be corrected.

2013-A001-00267 (Code Part [192.605(a)][192.605(c)(1)(iv)]) - Staff indicated that the operator's procedures were lacking for responding to the operation of any safety device. Staff reviewed Ameren Illinois' 2014 Gas Operating & Maintenance Plan, and noted that the operator has updated the O&M Plan EMER 2.11-Control Room 1. General C. After completing the review, the NOA can be corrected.

2013-A001-00268 (Code Part [192.605(b)(7)][192.735(b)]) - Staff indicated that the operator's O&M Plan did not have a procedure defining the storage of excess flammable or combustible at a safe distance from the compressor buildings. Staff reviewed Ameren Illinois' 2014 Gas Operating & Maintenance Plan, and noted that the operator has updated the O&M Plan to include the following information: SFCS 2.01 – Compressor Station subsection 3. Storage of Combustible or Flammable

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Materials. After completing the review, the NOA can be corrected.

2013-A001-00269 (Code Part [192.605(a)][192.605(c)(1)(v)]) - Staff indicated that the operator's procedures were lacking for responding to investigating and correcting the cause of any other unforeseeable malfunctions of a component, deviation from original operations or personal error. Staff reviewed Ameren Illinois' 2014 Gas Operating & Maintenance Plan, and noted that the operator has updated the O&M Plan EMER 2.11-Control Room 1. General. After completing the review, the NOA can be corrected.

2013-A001-00270 (Code Part [192.273(b)][192.285(b)(2)]) - Staff indicated that the operator's O&M Manual did not have a procedure that indicated if a person made an unacceptable joint. Staff reviewed Ameren Illinois' 2014 Gas Operating & Maintenance Plan, and noted that the operator has updated the O&M Plan to include the following information: POLY 2.09-Plastic Fusion Qualification. After completing the review, the NOA can be corrected.

2013-A001-00271 (Code Part [192.273(b)][192.287]) - Staff indicated that the operator's O&M Manual did distinguish what the training of construction inspector should be and the plan does not include management or field employees that should attend the training. Staff reviewed Ameren Illinois' 2014 Gas Operating & Maintenance Plan, and noted that the operator has updated the O&M Plan to include the following information: CONS 1-Gas Construction Oversight Requirements, 5. Construction Inspector. After completing the review, the NOA can be corrected.

2013-A002-00128 (Code Part [192.605(a)]) - Staff requested that procedure 2.04 Uprating a Leak subsection 6.B (5) be amended to specify and more accurately define the meaning of "Frequency of Public Complaints." Staff reviewed Ameren Illinois' 2014 Gas Operating & Maintenance Plan, and noted that the operator has updated the O&M Plan to include the following information: LEAK 2.04 Subsection 12. Multiple Public Leak Calls. After completing the review, the NOA can be corrected.

2013-A002-00210 (Code Part [192.605(b) (2)]) - Staff indicated that the operator's plan did not require a pipe inspection form to be completed on piping that was being abandoned. Staff reviewed Ameren Illinois' 2014 Gas Operating & Maintenance Plan the following sections were reviewed: ABND 2.01 Subsection 1. A, (8), Subsection 2., A., (10) and Subsection 5., E. states: If there is evidence for internal corrosion, it shall be documented on the Corrosion and Steel Damage Evaluation form. CORR 1 Subsection 6.,B. Section of pipe abandoned or removed for any reason shall be inspected for evidence of internal corrosion. After this review, the NOA can be corrected at this time.

2013-A002-00211 (Code Part [192.605(b)]) - Staff indicated that the operator did not document the leak test isolation point for abandonment. Staff reviewed Ameren Illinois' 2014 Gas Operating & Maintenance Plan LEAK 2.05 subsection 2., C., (3), (d). (d) now reads: Pipe Replaced/Srv Reinstated — this box is checked when a main or service pipe is installed to make repairs or when a service is temporarily disconnected from the source of gas supply and reinstated (see RNST 1). A pressure test must be performed if either of these actions has been taken during the repair. If Pipe Replaced/Srv Reinstated is not checked, no pressure information is required for below grade leaks. This box shall not be checked when service line is permanently disconnected, cut-off, abandoned, or retired. See ABND 2.01 for abandoned service line testing and reporting requirements. After this review, the NOA can be corrected.

2013-A002-00212 (Code Part [192.13(c)]) - Staff indicated that the operator's procedures were lacking requirements that would provide additional protection for shallow mains. Staff reviewed Ameren Illinois' 2014 Gas Operating & Maintenance Plan. Staff reviewed the following section of the operator's O&M Manual: Main 1 3. D. now reads: Additionally, mains that may be subjected to anticipated external loads, such as loaded truck traffic, material storage, or farming operations, must be reviewed to determine if additional protection is required to protect the main from damage due to the external loads. When such locations are encountered the Gas Supervisor or Contractor Services Supervisor will contact either Gas Engineer for the area if distribution main is being installed or Gas Tech Engineering if transmission or high pressure distribution is being installed. Engineering personnel will review to determine if additional protection is required and specify the appropriate protection method(s) to protect

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the main from the anticipated external loads. Location of shallow main should be recorded on the As-Built plans and indicate on Ameren Illinois' gas electronic mapping system. After this review, the NOA can be corrected.

Notice of Violations(s) Corrected:

2009-V001-0314 (Code Part [192.605]) - Staff reviewed Ameren Illinois 2014 Gas Operating & Maintenance Manual, and noted that the operator has updated the O&M Manual to include the NOA's that are listed in this Pipeline Safety Report. After completing the review of the outstanding NOA's and correcting them, Staff can corrected this NOPV.